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Senior Citizen Mobile Home Park

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

URSULA LICHTENSTEIN,

Debtor.

Case No.: 25-10340-nmc
Chapter 13

**LAS VEGAS JAYCEES SENIOR
CITIZENS MOBILE HOME PARK'S
OBJECTION TO CONFIRMATION OF
PLAN**

Las Vegas Jaycees Senior Citizen Mobile Home Park ("Jaycees"), through its counsel
Hutchison & Steffen, PLLC, submits this objection to the Plan submitted by debtor:

**1. Jaycees objects to exemption claimed concerning a manufactured home as exempt
under NRS 115.010.**

Debtor claims that a certain manufactured home identified as a 1994 Champion Infinity
II, with the serial number 09946364387AB (the "Manufactured Home") is an asset of the estate
exempted from execution under NRS 115.010. Debtor has not shown that NRS 115.010 applies.
First, the Manufactured Home was transferred out of Debtor's name in December 2024. Second,
even if the Manufactured Home is somehow brought back into the Estate or the Debtor has some
equitable interest in the Manufactured Home, the Debtor can no longer assert that the

1 Manufactured Home is a protected under NRS 115.010 as a homestead. The Debtor is not
2 supposed to be living in the home based on both the eviction and based on the criminal no-
3 contact orders. The Debtor transferred the home in a manner that suggests it was a fraudulent
4 transfer, which would nullify any claimed homestead. The Manufactured Home is set to be sold,
5 and Debtor will not be living there any longer.

6
7 **2. The plan does not account for the debt owed to Jaycees or the value of the**
8 **Manufactured Home which could cover all of the potential debts of the estate.**

9 The plan does not provide any provision for paying Jaycees' judgment. However, the
10 judgment could easily be paid if the Manufactured Home were part of the estate. Because the
11 plan provides payments for Jaycees debt and because the Manufactured Home could fully satisfy
12 that debt, the plan should not be confirmed.

13
14 Further, Jaycees concurs with the trustee's recommendations that the bankruptcy be
15 dismissed because there appears to be sufficient assets to cover all the debts.

16 Dated this 29th day of April 2025.

17 HUTCHISON & STEFFEN, LLC

18
19 */s/ Jeffrey R. Hall*

20 By: _____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 29th day of April 2025, a copy of the following document entitled: ***LAS VEGAS JAYCEES SENIOR CITIZENS MOBILE HOME PARK'S OBJECTION TO CONFIRMATION OF PLAN*** was served by Personally transmitting a copy of same via the Court's CM/ECF Internet system to their respective registered email site.

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/s/ Bobbie Benitez

An employee of Hutchison & Steffen, PLLC